

Mr J. Mark Erler
Erler Industries, Inc.
P. O. Box 219
North Vernon, IN 46514

Re: MPM 079-12808-00010
Minor Permit Modification to:
Part 70 Operating Permit No.: **T 079-7572-00010**

Dear Mr. Erler:

Erler Industries, Inc. was issued Part 70 operating permit **T 079-7572-00010** on September 23, 1998 for an operation which spray paints plastic and metal parts. A letter requesting to remove EU3 and add EU17 and EU18 was received on October 5, 2000. Pursuant to the provisions of 2-7-11 the permit is hereby administratively modified as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary operation which spray paints plastic and metal parts consists of the following emission units and pollution control devices:

Located in Plant 1 (418 Stockwell Street, North Vernon, Indiana 47265):

- (1) One (1) paint line, identified as Line 1, with ~~three (3)~~ **two (2)** manual paint booths, identified as EU1, ~~EU2,~~ and EU32, respectively **and two (2) robot paint booths, identified as EU17 and EU18, respectively, equipped with dry filters for particulate matter control, exhausting to stacks S/V1, S/V2, S/V17, respectively, EU18 exhausts to S/V18a and S/V18b, capacity: 327 parts per hour, each. with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V1, S/V2 and S/V3.**

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Located in Plant 1 (418 Stockwell Street, North Vernon, Indiana 47265):

- (1) One (1) paint line, identified as Line 1, with ~~three (3)~~ **two (2)** manual paint booths, identified as EU1, EU2, and EU3, respectively **and two (2) robot paint booths, identified as EU17 and EU18, respectively, equipped with dry filters for particulate matter control, exhausting to stacks S/V1, S/V2, S/V17, respectively, EU18 exhausts to S/V18a and S/V18b, capacity: 327 parts per hour, each. with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V1, S/V2 and S/V3.**
- (2) One (1) paint line, identified as Line 2, with two (2) manual paint booths, identified as EU4 and EU5 respectively, with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V4 and S/V5.

Plant 1 utilizes HVLP, air atomized and electrostatic paint guns.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

- (a) The input VOC to Line 1 (EU1, EU2, ~~and EU~~**EU17 and EU18**) shall be limited to 24.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable.
- (b) The input VOC to Line 2 (EU4, and EU5) shall be limited to 24.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable.
- (c) Compliance with these VOC limits will also make 326 IAC 2-2 and 326 IAC 8-2-9 not applicable.

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stacks, S/V1, S/V2, S/V3, S/V4, ~~and S/V5,~~ **S/V17, S/V18a and S/Vb** while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The equipment listed in the quarterly report form for Plant 1/Line 1 has been changed as followed:

Source Name:	Erler Industries, Inc.
Source Address:	418 Stockwell Street, North Vernon, Indiana 47265
Mailing Address:	PO Box 219, North Vernon, Indiana 47265
Part 70 Permit No.:	079-7572-00010
Facility:	Plant 1/Line 1 (EU1, EU2, EU3 EU17, EU18)

Erler Industries, Inc.
North Vernon, Indiana

Page 3 of 4
MPM 079-12808-00010

Parameter:	VOC
Limit:	24.0 tons per year

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

Erler Industries, Inc.
North Vernon, Indiana

Page 4 of 4
MPM 079-12808-00010

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Paula M Cognitore, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

PMC/MES

cc: File - Jennings County
U.S. EPA, Region V
Jennings County Health Department
Air Compliance Section Inspector - D.J. Knotts
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Erler Industries, Inc.
418 Stockwell Street
North Vernon, Indiana 47265**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Part 70 Operating Permit 079-7572-00010 issued September 23, 1998
First Administrative Amendment 079-10586-00010 issued August 20, 1999
Part 70 First Significant Source Modification 079-11008-00010 issued September 27, 1999
Part 70 First Minor Source Modification 079-12803-00010 issued

First Minor Permit Modification: 079-12808-00010	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary operation which spray paints plastic and metal parts.

Responsible Official:	J. Mark Erler
Source Address:	418 Stockwell Street, North Vernon, Indiana 47265
Mailing Address:	PO Box 219, North Vernon, Indiana 47265
SIC Code:	3479, 3663
County Location:	Jennings
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary operation which spray paints plastic and metal parts consists of the following emission units and pollution control devices:

Located in Plant 1 (418 Stockwell Street, North Vernon, Indiana 47265):

- (1) One (1) paint line, identified as Line 1, two (2) manual paint booths, identified as EU1 and EU2, respectively and two (2) robot paint booths, identified as EU17 and EU18, respectively, equipped with dry filters for particulate matter control, exhausting to stacks S/V1, S/V2, S/V17, respectively, EU18 exhausts to S/V18a and S/V18b, capacity: 327 parts per hour, each.
- (2) One (1) paint line, identified as Line 2, with two (2) manual paint booths, identified as EU4 and EU5 respectively, with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V4 and S/V5.

Plant 1 utilizes HVLP, air atomized and electrostatic paint guns.

Located in Plant 2 (71 Hayden Pike, North Vernon, Indiana 47265):

- (1) One (1) paint line, identified as Line A, with three (3) manual paint booths, identified as EU6, EU7 and EU8, respectively, with a maximum of two (2) HVLP guns per booth, each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V6, S/V7, and S/V8.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Located in Plant 1 (418 Stockwell Street, North Vernon, Indiana 47265):

- (1) One (1) paint line, identified as Line 1, two (2) manual paint booths, identified as EU1 and EU2, respectively and two (2) robot paint booths, identified as EU17 and EU18, respectively, equipped with dry filters for particulate matter control, exhausting to stacks S/V1, S/V2, S/V17, respectively, EU18 exhausts to S/V18a and S/V18b, capacity: 327 parts per hour, each.
- (2) One (1) paint line, identified as Line 2, with two (2) manual paint booths, identified as EU4 and EU5 respectively, with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V4 and S/V5.

Plant 1 utilizes HVLP, air atomized and electrostatic paint guns.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

- (a) The input VOC to Line 1 (EU1, EU2, EU17 and EU18) shall be limited to 24.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable.
- (b) The input VOC to Line 2 (EU4, and EU5) shall be limited to 24.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable.
- (c) Compliance with these VOC limits will also make 326 IAC 2-2 and 326 IAC 8-2-9 not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from Plant 1 (Line 1 and Line 2) and the insignificant activities listed in Condition D.3.1, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Plant 1 and any dry filters.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Conditions D.1.1 and D.1.2 shall be

determined by a performance test conducted in accordance with Section C - Performance

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the two (2) paint lines (Line 1 and Line 2) are in operation.

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stacks, S/V1, S/V2, S/V3, S/V4, S/V5, S/V17, S/V18a and S/V18b while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements [326 IAC 2-7-6]

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
Mailing Address: PO Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: 079-7572-00010
Facility: Plant 1/Line 1 (EU1, EU2, EU17, EU18)
Parameter: VOC
Limit: 24.0 tons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Minor Permit Modification

Source Background and Description

Source Name:	Erler Industries, Inc.
Source Location:	418 Stockwell Street, North Vernon, Indiana 46265
County:	Jennings
SIC Code:	3663
Operation Permit No.:	T 079-7572-00010
Operation Permit Issuance Date:	September 28, 1998
Minor Permit Modification	No.: T 070-12808-00010
Permit Reviewer:	Paula M. Cognitore/MES:

The Office of Air Management (OAM) has reviewed a modification application from Erler Industries, Inc. relating to the operation of spray painting plastic and metal parts.

History

On October 5, 2000, Erler Industries, Inc. submitted an application to the OAM requesting to replace one (1) manual paint booth (EU3), located in Plant 1 Line 1, with (1) robot paint booth (EU17) and to add an additional robot paint booth(EU18) to Line 1 at their existing plant. Erler Industries, Inc. was issued a Part 70 permit on September 23, 1998. The First Administrative Amendment, AA 079-10586-00010 was issued August 20, 1999, 1999 and their First Significant Source Modification was issued September 27, 1999.

Permit Modification

Pursuant to 326 IAC 2-7-12(b), this proposed minor permit modification to the Part 70 Operating Permit, T 079-7572-00010, issued September 23, 1998, is required to incorporate the first minor source modification, T 079-12803-00010, into the Part 70 Operating Permit. The permit modification will allow for the operation of the facilities covered in the minor source modification, T079-12803-00010.

Conclusion

The operation of spray painting plastic and metal parts. shall be subject to the conditions of the attached proposed Part 70 Minor Permit Modification No. 079-12808-00010.